

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JOCELYNE MOSBY,

Plaintiff,

v.

SAFELITE FULFILLMENT, INC.

d/b/a SAFELITE AUTOGLASS

Defendant.

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C.A. NO. 3:24-cv-03067-K

JURY TRIAL DEMANDED

DEFENDANT’S DESIGNATION OF EXPERT WITNESS

Pursuant to Federal Rule of Civil Procedure 26 and the Order of this Court, Defendant Safelite Fulfillment, Inc. d/b/a Safelite AutoGlass (“Safelite”) designate the following expert witness in the above-referenced matter:

A. STEVEN R. RECH

Vorys, Sater, Seymour and Pease LLP
909 Fannin, Suite 2700
Houston, Texas 77010
(713) 588-7000

Mr. Rech is an attorney licensed to practice law in Texas. He has extensive experience in developing and litigating lawsuits. Mr. Rech may provide expert testimony concerning the reasonableness and necessity of the attorneys’ fees and costs incurred by the parties in this matter. His testimony will be based upon his education, background, training and knowledge as an attorney licensed in the State of Texas and based on his familiarity with reasonable and customary charges for legal services in the State of Texas and the applicable legal standards. Mr. Rech is expected to provide rebuttal testimony about the attorneys’ fees claimed by the Plaintiff and may

provide testimony on the reasonableness of attorneys' fees incurred by the Plaintiff. He may also testify as to any issue related to this subject matter raised by Plaintiff's experts.

Reasonable and necessary attorneys' fees are generally determined by examining many factors, including the time and labor required, the novelty and difficulty of the questions involved, and the skill required to perform the legal services properly; the likelihood that the acceptance of the particular employment will preclude other employment by the attorney; the fee customarily charged in the locality for similar legal services; the amount involved and the results obtained; the time limitations imposed by the client or by the circumstances; the nature and length of the professional relationship with the client; the experience, reputation and ability of the attorneys performing the services; and whether the fee is fixed or contingent upon results obtained, that is, the uncertainty of collection before the legal services have been rendered. Mr. Rech will base his opinion on these factors.

Mr. Rech's opinions will be based upon his review of the relevant documents, including pleadings, filings, and discovery, as well as redacted billing statements issued by counsel to the Plaintiff in this matter. Mr. Rech's mental impressions may also be based on information generated by other experts in this matter, and the testimony of the parties and other witnesses in this lawsuit. Because the full amounts of fees incurred by Plaintiff will be unknown until the time of trial, Mr. Rech will be unable to express a definitive opinion as to the reasonableness and necessity of Plaintiff's attorneys' fees until at or near the time of trial. Defendants will supplement this disclosure as such time Mr. Rech's expert review and analysis are complete.

The resume of Mr. Rech may be found at www.vorys.com.

Respectfully submitted,

VORYS, SATER, SEYMOUR AND PEASE LLP

/s/Hamed Moradi

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***Attorneys for Defendant
Safelite Fulfillment, Inc. d/b/a Safelite
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CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2025, I electronically served the foregoing *Defendant's Designation of Expert Witness* on the following:

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Attorney for Plaintiff

/s/ Hamed Moradi

Hamed Moradi